



January 22, 2019

Dr. Jean-Pierre Wolff, Chair
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 934001

RE: Comments to AG Order 4.0 Options Tables
Central Coast Irrigated Lands Regulatory Program

Please let me introduce myself and the company that I work for. My name is John Bramers, I graduated from Cal Poly San Luis Obispo in 1993 with a degree in Ag Business, shortly after graduation I started working full time for Merrill Farms in Salinas California. Merrill Farms is a fourth generation farming company and just celebrated its 85th year in 2018. Today the company operates on 7,000 land acres in Monterey County employing 20 full time employees and 160 part time irrigators and tractor drivers

Merrill Farms LLC recognizes that inputs used in commercial, irrigated agriculture can contribute nutrients to surface and groundwater in the areas where we farm. This can result in human health hazards and environmental degradation. We are committed to minimizing negative impacts to local waters through continuous review and revision of our farming practices. The Merrill Farms' Irrigation & Nutrient Management Plan (INMP) is one component that guides our efforts to protect the natural resources where we farm and to continually increase agronomic efficiencies critical in our marketplace. Another component to the guides our efforts are the hiring of licensed PCA's and Pest Control Businesses.

I am very concerned with the new staff proposed matrix for the irrigated lands program that is being proposed. Quite honestly I am not sure what I am actually supposed to do with everything being a TBD in the options table. I believe that a more science based approach that can determine with some certainty what can and will work on the farm is a better approach, to Work collaboratively with growers and regulators. I have read the letter that Norm Groot from the Monterey County Farm Bureau wrote and hope that all the Board and Staff will also read the letter. I concur with Norm on what is being presented by the regional board staff in Ag Order 4.0 and its Option Tables. I hope that the Regional Board and Staff will give great consideration to the proposal that Trade Association Partners on the Central Coast is going to put forward.

Sincerely,

John Bramers
Chief Compliance Officer